



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**  
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**DENVER, CO 80202-2466**  
**<http://www.epa.gov/region08>**

Ref: 8EPR-EP

J. David Holm,  
Director  
Water Quality  
Control Division  
Colorado  
Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

Re: Section 303(d) Total Maximum Daily Load  
(TMDL) Waterbody List

Dear Mr. Holm:

Thank you for your submittal of Colorado's 1998 Clean Water Act Section 303(d) waterbody list. EPA has conducted a complete review of this waterbody list dated March 24, 1998 and supporting documentation and information. Based on this review, EPA has determined that Colorado's 1998 list of water quality limited segments (WQLSs) still requiring TMDLs meets the requirements of Section 303(d) of the Clean Water Act ("CWA" or "the Act") and EPA's implementing regulations. Therefore, by this order, EPA hereby APPROVES Colorado's Section 303(d) list. The statutory and regulatory requirements, and a summary of EPA's review of Colorado's compliance with each requirement, are described in the enclosure.

EPA's approval of Colorado's Section 303(d) list extends to all waterbodies on the list with the exception of those waters that are within Indian Country, as defined in 18 U.S.C. Section 1151. EPA is taking no action to approve or disapprove the State's list with respect to those waters at this time. EPA, or eligible Indian Tribes, as appropriate, will retain responsibilities under Section 303(d) for those waters.

The State described its public participation process for development of the Section 303(d) list in its submittal. Colorado's process included public notices of the list, gathering input through a TMDL Advisory Committee, and mailings to several entities soliciting their input. In addition, an informational hearing on the list was conducted by the Colorado Water Quality Control Commission. Throughout the development process, starting in June 1997, the State made an effort to inform and engage a range of groups by making presentations and to periodically brief the Water Quality Control Commission and the Colorado Water Quality Forum.



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EPA has also received Colorado's long-term schedule for TMDL development for all waters on the 1998 list. We acknowledge and appreciate receipt of this schedule. Further discussion of this schedule will be forthcoming in a separate letter to you in the near future.

The State of Colorado has continued to provide a quality assessment of its waters. We appreciate the time and care your staff has taken in developing the §303(d) list of waters. In particular, we are especially thankful for the hard work from the members of your staff to put together a well organized and thorough document. We wish to continue our support in your efforts to develop TMDLs for the waters identified on the list.

Again, thank you for the efforts related to the excellent job of developing the §303(d) TMDL waterbody list for the 1998-2000 biennium. If you have questions on any of the above information, feel free to give me or Bruce Zander (303/312-6846) of my staff a call.

Sincerely,

Max H. Dodson,  
Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation

Enclosure

## **Review of Colorado's 1998 Section 303(d) Waterbody List**

*Attachment to July 15, 1998 letter from Max H. Dodson, Assistant Regional Administrator,  
Office of Ecosystems Protection and Remediation, US EPA, Region VIII to J. David Holm, Director,  
Water Quality Control Division, Colorado Department of Public Health and Environment*

Date of Transmittal Letter from State: March 27, 1998

Date of Receipt by EPA: March 30, 1998

### Purpose

The purpose of this review document is to describe the rationale for EPA's approval of Colorado's 1998 Section 303(d) waterbody list as submitted on March 27, 1998 ("submittal"). The following sections identify those key elements to be included in the list submittal based on the Clean Water Act ("Act") and EPA regulations (see 40 C.F.R. 130.7). EPA reviewed the methodology used by the State in developing the §303(d) list and the State's description of the data and information it considered. EPA's review of Colorado's §303(d) list is based on EPA's analysis of whether the State reasonably considered existing and readily available water quality-related data and information and reasonably identified waters required to be listed.

### Statutory and Regulatory Background

Section 303(d)(1) of the Act directs States to identify those waters within its jurisdiction for which effluent limitations required by Section 301(b)(1)(A) and (B) are not stringent enough to implement any applicable water quality standard, and to establish a priority ranking for such waters, taking into account the severity of the pollution and the uses to be made of such waters. The Section 303(d) listing requirement applies to waters impaired by point and/or nonpoint sources, pursuant to EPA's long-standing interpretation of Section 303(d).

EPA regulations provide that States do not need to list waters where the following controls are adequate to implement applicable standards: (1) technology-based effluent limitations required by the Act, (2) more stringent effluent limitations required by State or local authority, and (3) other pollution control requirements required by State, local, or federal authority. (See 40 C.F.R. 130.7(b)(1).)

In developing Section 303(d) lists, States are required to assemble and evaluate all existing and readily available water quality-related data and information, including, at a minimum, consideration of existing and readily available data and information about the following categories of waters: (1) waters identified as partially meeting or not meeting designated uses, or as threatened, in the State's most recent Section 305(b) report; (2) waters for which dilution calculations or predictive modeling indicate nonattainment of applicable standards; (3) waters for which water quality problems have been reported by governmental agencies, members of the public, or academic institutions; and (4) waters identified as impaired or threatened in any Section 319 nonpoint assessment submitted to EPA. (See 40 C.F.R. 130.7(b)(5).) In addition to these

minimum categories, States are required to consider any other data and information that is existing and readily available. EPA's 1991 Guidance for Water Quality-Based Decisions describes categories of water quality-related data and information that may be existing and readily available. (See Guidance for Water Quality-Based Decisions: The TMDL Process, EPA Office of Water, 1991, Appendix C ("EPA's 1991 Guidance.") While States are required to evaluate all existing and readily available water quality-related data and information, States may decide to rely or not rely on particular data or information in determining whether to list particular waters.

In addition to requiring States to assemble and evaluate all existing and readily available water quality-related data and information, EPA regulations at 40 C.F.R. 130.7(b)(6) require States to include as part of their submissions to EPA documentation to support decisions to rely or not rely on particular data and information and decisions to list or not list waters. Such documentation needs to include, at a minimum, the following information: (1) a description of the methodology used to develop the list; (2) a description of the data and information used to identify waters; and (3) any other reasonable information requested by the Region.

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#### Review of Colorado's Submission

##### *A. Description of the methodology used to develop the list. (§130.7(b)(6)(i))*

The State's methodology is described in its §303(d) submittal in Section III, "List Development." In particular, listing criteria, de-listing criteria, information considered, sources of information, guidelines on "Credible Evidence," and use support assessment methodology are all discussed in that section. The most direct assessment methodology was based on comparing a waterbody's quality with the appropriate stream standards. Both numeric and narrative standards were used in this assessment. Appendix A summarizes the basic approach used.

The State also included waters that had "temporary modifications" applied to them. These modifications are water numeric water quality standards that apply on a temporary basis to a water segment, serving as a variance from the underlying water quality standards. Most often, wherever a "temporary modification" is in place, the ambient water quality exceeds the underlying standard, so the presumption is that uses are being impaired based on the exceedence of the underlying standards. (See section 3.1.7(3) on temporary modifications in The Basic Standards and Methodologies for Surface Water 3.1.0 (5CCR 1002-8); Colorado Department of Public Health and Environment, Water Quality Control Commission (last amended January 8, 1996.)

Colorado properly listed waters with nonpoint sources causing or expected to cause impairment, consistent with Section 303(d) and EPA guidance. Section 303(d) lists are to include all WQLSs still needing TMDLs, regardless of whether the source of the impairment is a point and/or nonpoint source. EPA's long-standing interpretation is that Section 303(d) applies to waters impacted by point and/or nonpoint sources. This interpretation has been described in EPA

guidance, most recently in a 1997 memorandum clarifying certain requirements for 1998 Section 303(d) lists. (See EPA's 1991 Guidance and the August 27, 1997, EPA guidance listed below.) In addition, this interpretation of Section 303(d) is described in detail in a May 23, 1997, memorandum from Geoffrey Grubbs, Director of the Assessment and Watershed Protection Division, EPA Office of Water, to the FACA Workgroup on Section 303(d) Listing Criteria. (See May 23, 1997 and August 8, 1997 references listed below.)

EPA has reviewed the State's methodology used to develop the list and finds that methodology reasonable and sufficient for purposes of Section 303(d).

*B. Description of the data and information used to identify waters, including a description of the data and information used by the state as required by section 130.7(b)(5). (§130.7(b)(6)(ii))*

Colorado provides a description of the data and information used in Section III.(C) ("Information Considered") and Section III.(D) ("Assessment Methodology"). Information and data bases consulted included the State water quality standards (in part, to determine which waters had temporary modifications), discharge permit system files, and STORET (EPA's national water quality data base). Further, the State actively solicited various entities for data and information that could be used in the list development process. A list of entities solicited and other data bases used is given on page 4 of the State's submittal.

In its lists of §303(d) waters, the State indicates on a waterbody-by-waterbody basis the type of data or assessment used to list the waterbody. This includes biological data, water quality data, fish consumption advisories, and temporary modification status.

EPA has reviewed the data and information the State has used in developing the §303(d) list and finds that collection of data and information reasonable and sufficient for purposes of developing a §303(d) waterbody list.

*. Waters identified by the State in its most recent section 305(b) report as "partially meeting" or "not meeting" designated uses or as "threatened" (§130.7(b)(5)(i))*

The waters included in the most recent Colorado §305(b) report (see September 1996 document listed below) that were identified as "not supporting", "partially supporting", or "threatened" were included on the §303(d) list if the supporting data and information conformed with the Credible Evidence criteria given in the §303(d) methodology (see page 6 of submittal). The State anticipates that the 1998 §303(d) list and the list of waters in the upcoming 1998 §305(b) report identified as "not supporting", "partially supporting", or "threatened" will be identical. The State is striving to have full consistency between the assessments given in its §305(b) report and the §303(d) list.

*. Waters for which dilution calculations or predictive models indicate nonattainment of applicable water quality standards (§130.7(b)(5)(ii))*

The State also listed waters where the results of dilution calculations or predictive models indicated the water was threatened or impaired. One example of this is the South Platte River segment through Denver (COSPUS14) which was included on the list, in part, because mathematical modeling of nitrate concentrations demonstrated a concern regarding maintaining water quality standards for nitrate.

*. Waters for which water quality problems have been reported by local, state, or federal agencies; members of the public; or academic institutions (§130.7(b)(5)(iii))*

The State actively solicited various entities for data and information that could be used in the list development process. A list of entities solicited and other data bases used is given on page 4 of the State's submittal.

In addition, the State used biological assessments from the Colorado Division of Wildlife as a basis for listing waters. This includes fish population data, trend data, and information on Species of Critical Concern including native fish species.

The State also relied upon watershed assessment results from US Forest Service Hydrologists to list waters. Information from the USFS included physical, chemical, and biological data and information.

*. Waters identified by the State as impaired or threatened in a nonpoint assessment submitted to EPA under section 319 of the CWA or in any updates of the assessment (§130.7(b)(5)(iv))*

The State evaluated the nonpoint source ("NPS") data and information that had been obtained through its historical NPS assessments. If the data or information met the State's §303(d) Credible Evidence criteria (see page 6 of the State's submittal), then the waterbody was listed based on the data or information. Further, there is general consistency between the §319 NPS projects in the State and the waterbodies on the 1998 §303(d) list. Examples are the San Miguel River (sediment), Straight Creek (sediment), and Lower Rio Blanco River (sediment), which were on the State's final Section 303(d) waterbody list.

EPA has reviewed Colorado's description of the water quality-related data and information it considered for identifying waters on the §303(d) list. EPA concludes that the State properly assembled and evaluated all existing and readily available data and information, including data and information relating to the categories of waters specified in 40 C.F.R. 130.7(b)(5).

*C. A rationale for any decision to not use any existing and readily available data and information for any one of the categories of waters as described in §130.7(b)(5) (§130.7(b)(6)(iii))*

For purposes of developing a technically sound waterbody list, the State developed Credible Evidence criteria for data and information used in the 1998 listing process as described on page 6 of the State's submittal. The Credible Evidence criteria included both monitored as well as evaluated data and information. An example of monitored data being used as a basis for listing is Eagle River (segment COUCEA05), listed for metals impairment as evidenced by water quality data. An example of evaluated data being used as a basis for listing is Big Springs Creek (segment CORGCB12), listed for impairment due to sediment.

EPA reviewed the State's criteria developed for the 1998 listing process, and determined that the rationales for not using certain existing and readily available water quality-related data and information were reasonable. The State's consideration of the age of the data, quantity of the data, evidence of quality control on the data, and the qualifications of personnel that collected biological or physical data on waterbodies as factors in determining whether particular data and information was sufficiently reliable to use as a basis for listing waters. Consideration of these factors in evaluating water quality-related data and information is consistent with EPA's Section 305(b) guidance, and EPA believes these factors are similarly appropriate for Colorado to consider in evaluating information to determine whether waters should be included on the State's Section 303(d) list. Unless data or information existed for a waterbody that met these criteria, the data and information was generally not used and the waterbody was not listed on the §303(d) list. Colorado developed its Credible Evidence criteria through a state Task Force consisting of representatives from a wide range of stakeholder groups. Use of the Credible Evidence criteria in the 1998 listing process resulted in a Section 303(d) list generally consistent with the State's 1996 list -- application of the criteria resulted in Colorado's decision to remove eight waters that had previously been listed, based on the State's determination that the available data and information for those waters was not sufficiently reliable to use as a basis for listing. Other waters were delisted based on such reasons as new information showing that standards are being met and errors in the original listing (see March 31, 1998 reference listed below for further documentation on waters that were delisted from the Colorado's 1996 list.)

EPA notes that for many of those waters that do not have data or information that meet the Credible Evidence criteria, the State has indicated its intent to conduct an aggressive monitoring program to collect reliable data to use as a basis for determining the quality of these waters (see April 15, 1998 document listed below). The State intends to add or remove waters from subsequent §303(d) lists as warranted by results of its monitoring efforts over the next 5 - 7 years. Although a state is not required by the Clean Water Act to develop such a monitoring list, EPA applauds Colorado's commitment to identifying and assessing an increasing number of waters for purposes of §303(d) listing.

EPA has reviewed the State's rationale for not using certain data and information and have found such rationale reasonable and sufficient for purposes of Section 303(d).

*D. Any other reasonable information requested by Regional Administrator. (§130.7(b)(6)(iv))*

Information requested by EPA Region VIII covered issues regarding: 1) continuity between the 1996 and 1998 §303(d) lists, 2) continuity between the 1996 §305(b) report and the 1998 §303(d) list, and 3) schedule for monitoring of the waters on the Monitoring and Evaluation List in the submittal.

The State has provided adequate responses to all the information requests from the Region (see documents below for dates March 31, 1998; April 15, 1998; April 17, 1998, and May 1, 1998).

The State addresses the issue of previously-listed waters and/or pollutants not included on the 1998 list which had been included on its 1996 list in correspondence to EPA (see document for March 31, 1998 listed below). In some cases, the State has de-listed waters from the 1996 list. Reasons for de-listing included: 1) EPA-approved TMDLs have been developed for all the pollutants of concern, 2) there is evidence that water quality standards are now being achieved, or 3) the supporting data does not meet the Credible Evidence criteria.

EPA concludes that the State has provided good cause for removing previously-listed waters from its Section 303(d) list. Since EPA regulations require only those WQLSs still requiring TMDLs to be listed, where certain other controls are not sufficient to attain water quality standards, waters for which TMDLs have been developed and approved need not be included on the Section 303(d) list. Waters for which the State has information showing that applicable standards are being met also are not required to be listed. Finally, Colorado's submission demonstrates good cause for not including waters lacking data and information meeting the State's Credible Evidence criteria -- the data and information used as a basis for listing those waters was no longer considered by the State as an accurate depiction of use support in those waters pursuant to the State's 1998 listing criteria. These criteria are described in the State's submission, and in Section C above. For this last category of waters, EPA notes that, while not required by Section 303(d) of the Act or EPA eh, the State has committed to monitoring those waters over the next 5 - 7 years.

*E. Prioritization of waters on the list taking into account the severity of the pollution and the uses to be made of such waters; the prioritization shall specifically include the identification of waters targeted for TMDL development in the next two years (§130.7(b)(4))*

EPA regulations interpret the requirement in Section 303(d)(1)(A) of the Clean Water Act that States establish a priority ranking for listed waters. The regulations at 40 C.F.R. 130.7(b)(4) require States to prioritize waters on their Section 303(d) lists for TMDL development, and also to identify those WQLSs targeted for TMDL development in the next two years. In prioritizing and targeting waters, States must, at a minimum, take into account the severity of the pollution and the uses to be made of such waters. (See Section 303(d)(1)(A).) As long as these factors are taken into account, the Act provides that it is the States that establish priorities rather than EPA. States may consider other factors relevant to prioritizing waters for TMDL development,



including immediate programmatic needs, vulnerability of particular waters as aquatic habitats, recreational, economic, and aesthetic importance of particular waters, degree of public interest and support, and state or national policies and priorities. (See 57 Fed. Reg. at 33040, 33045 (July 24, 1992), and EPA's April 1991 Guidance listed below.)

The State provided a discussion regarding its prioritization method starting on page 6 of the submittal. The method resulted in assigning a "High", "Medium", or "Low" priority to each of the waters on the list. The prioritization method included consideration of primary factors such as the severity of the problem and the use classification of the waterbody, and secondary factors such as stakeholder readiness, ecological importance of the waterbody and resident aquatic species, programmatic needs, and court orders. The State acknowledges that there are some TMDLs that are a high priority based on these factors, but are also complex TMDLs. In such cases, the development of TMDLs may take longer than that of simple, lower priority TMDLs that are begun after the high priority TMDL.

EPA reviewed the State's priority ranking of listed waters for TMDL development, and concludes that the State properly took into account the severity of pollution and the uses to be made of such waters, as well as other relevant factors.

In addition, EPA reviewed the State's identification of WQLSs targeted for TMDL development in the next two years, and concludes that the targeted waters are appropriate for TMDL development in this time frame. The targeting of waters was based on a combination of the severity of the problem, the availability of sufficient data, and programmatic needs for the TMDL (e.g. expiring NPDES permits that need a TMDL). Targeted waterbodies/TMDLs are indicated on the State's list under the column identified as "TAR".

EPA recognizes the State is continuing to work on certain TMDLs that were targeted for development in the 1996 - 1998 biennium and are now targeted for the 1998 - 2000 period. This includes completing the South Platte copper and nitrate TMDLs, working with stakeholder groups in the Animas Basin on metal TMDLs, and completing updated TMDLs on certain waterbodies that receive discharges from NPDES permittees.

EPA has found the waterbody prioritization and targeting method used by Colorado as reasonable and sufficient for purposes of Section 303(d).

*F. Identification of the pollutants causing or expected to cause violation of the applicable water quality standards (§130.7(b)(4))*

The State identified the pollutants causing or expected to cause violation of the applicable water quality standards, including those pollutants that have no corresponding numeric criteria in the State standards (e.g. sediment). The State's identification of the relevant pollutants is found on the §303(d) list.

EPA concludes that the State has appropriately identified pollutants causing or expected

to cause exceedences of applicable water quality standards.

*G. Documents used in review of Colorado's §303(d) waterbody submittal*

The following list of documents were used directly or indirectly as a basis for EPA's review of the State's §303(d) waterbody list. This list is not meant to be an exhaustive list of all records reviewed, but to provide the primary documents the Region relied upon in making its decisions to approve the State's list.

December 28, 1978 Federal Register Notice, *Total Maximum Daily Loads Under Clean Water Act*, finalizing EPA's identification of pollutants suitable for TMDL calculations, 43 Fed. Reg. 60662

January 11, 1985 Federal Register Notice, *40 C.F.R. Parts 35 and 130, Water Quality Planning and Management: Final Rule*, 50 Fed. Reg. 1774

April 1991, "Guidance for Water Quality-Based Decisions: The TMDL Process," EPA 440/4-91-001.

July 24, 1992 Federal Register Notice, *40 C.F.R. Parts 122, 123, 130*, revision of regulation, 57 Fed. Reg. 33040

August 8, 1997 memorandum from Robert Perciasepe, Assistant Administrator, Office of Water, to Regional Administrators and Regional Water Division Directors entitled "New Policies for Establishing and Implementing TMDLs."

August 13, 1992 memorandum from Geoffrey Grubbs, Director, Assessment and Watershed Protection Division, Office of Water, EPA Headquarters, to EPA Water Quality Branch Chiefs, Regions I - X and TMDL Coordinators, Regions I - X, regarding "Supplemental Guidance on Section 303(d) Implementation."

October 30, 1992 memorandum from Geoffrey Grubbs, Director, Assessment and Watershed Protection Division, Office of Water, EPA Headquarters, to Water Quality Branch Chiefs, Regions I - X, regarding "Approval of 303(d) Lists, Promulgation Schedules/Procedures, Public Participation."

November 26, 1993 memorandum from Geoffrey Grubbs, Director, Assessment and Watershed Protection Division, Office of Water, EPA Headquarters, to Water Quality Branch Chiefs, Regions I - X, and TMDL Coordinators, Regions I - X, regarding "Guidance for 1994 Section 303(d) Lists."

40 C.F.R. Part 130 Water Quality Planning and Management

January 8, 1996 (last amended) The Basic Standards and Methodologies for Surface Water 3.1.0 (5CCR 1002-8); Colorado Department of Public Health and Environment, Water Quality Control Commission.

September 1996 305(b) report entitled Status of Water Quality in Colorado 1996 published by the Colorado Department of Public Health and Environment.

May 23, 1997 memorandum from Geoffrey H. Grubbs, Director, Assessment and Watershed Protection Division, Headquarters, US EPA to FACA Workgroup on Section 303(d) Listing Criteria, regarding "Nonpoint Sources and Section 303(d) Listing Requirements."

July 22, 23; 1997 agenda and presentation notes from the TMDL Workshop; EPA Region VIII States & Tribes (Denver, Colorado).

August 27, 1997 memorandum from Robert H. Wayland III, Director, Office Wetlands, Oceans, and Watershed, Office of Water, EPA Headquarters, to Water Division Directors, Regions I - X, and Directors, Great Water Body Programs, and Water Quality Branch chiefs, Regions I - X, regarding "National Clarifying Guidance For 1998 State and Territory Section 303(d) Listing Decisions."

September, 1997 guidance from Office of Water, Headquarters, US EPA regarding Guidelines for Preparation of the Comprehensive State Water Quality Assessments (305(b) Reports) and Electronic Updates: Supplement, EPA-841-B-97-002B.

September 12, 1997 letter from Carol L. Campbell, Director, Ecosystems Protection Program, Office of Ecosystems Protection & Remediation, US EPA, Region VIII to J. David Holm, Director, Water Quality Control Division, Colorado Department of Public Health and Environment regarding "Transmittal of TMDL Guidance."

November 24, 1997 memo from Sarah Johnson, Colorado WQCD to Bruce Zander, EPA Region VIII EPR-EP regarding "303(d) List Development Mailing List."

January 27, 1998 presentation notes from Bruce Zander, US EPA, Region VIII from the Region VIII 305(b) Coordinators' Meeting entitled "Relationship Between Section 303(d) & Section 305(b)."

February 4, 1998 letter from Max H. Dodson, Assistant Regional Administrator, Office of Ecosystems Protection and Remediation, US EPA, Region VIII to J. David Holm, Director, Water Quality Control Division, Colorado Department of Public Health and Environment and Region VIII Water Quality Directors regarding "303(d) Listing Requirements; Expiring Permits."

March 4, 1998 letter from Ann M. Lininger Earth Justice Legal Defense Fund, Inc. to Sarah

Johnson Water Quality Control Division, Colorado Department Public Health and Environment regarding the draft §303(d) list.

March 27, 1998 letter from J. David Holm, Director, Water Quality Control Division, Colorado Department of Public Health and Environment to Max Dodson, Assistant Regional Administrator, Office of Ecosystems Protection and Remediation, US EPA Region VIII transmitting the "Colorado 1998 303(d) List: Water Quality Limited Segments Still Requiring TMDLs."

March 31, 1998 letter from Sarah Johnson, Manager, Assessment Unit, Water Quality Control Division, Colorado Department Public Health and Environment to Bruce Zander, TMDL Coordinator, Office of Ecosystems Protection and Remediation, US EPA Region VIII regarding the "1998 303(d) list: Continuity between 1996 and 1998 Lists."

April 15, 1998 letter from Sarah Johnson, Manager, Assessment Unit, Water Quality Control Division, Colorado Department Public Health and Environment to Bruce Zander, TMDL Coordinator, Office of Ecosystems Protection and Remediation, US EPA Region VIII regarding the "1998 303(d) list: Continuity between 1996 305(b) Report and 1998 303(d) List."

April 17, 1998 letter from Sarah Johnson, Manager, Assessment Unit, Water Quality Control Division, Colorado Department Public Health and Environment to Bruce Zander, TMDL Coordinator, Office of Ecosystems Protection and Remediation, US EPA Region VIII regarding the "1998 303(d) list: Clarification and Late Public Comment."

May 1, 1998 phone communication report from Bruce Zander, TMDL Coordinator, Office of Ecosystems Protection and Remediation, US EPA Region VIII regarding a conversation between him and Sarah Johnson, Manager, Assessment Unit, Water Quality Control Division, Colorado Department Public Health and Environment which addressed 319 nonpoint source issues and the 1998 303(d) waterbody list.

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